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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)	No. CR-09-0350 WHA / EDL
)	
12 Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER MODIFYING CONDITIONS OF
13 vs.)	RELEASE FOR SELF-SURRENDER
)	
14 ALEXANDER JAMES TRABULSE,)	
)	
15 Defendant.)	
_____)	
16		

17 On January 9, 2009, this Court imposed conditions of release on the Defendant,
18 Alexander James Trabulse, that includes a restriction of strict home confinement, monitored with
19 an electronic monitoring device. Initially Mr. Trabulse was compelled to remain home 24 hours
20 per day, 7 days per week, except for Court appearances, legal visits, attendance of religious
21 services, and medical emergencies. On May 6, 2009, the Court modified the conditions such that
22 Mr. Trabulse is permitted to leave home Monday through Friday from 1:00 PM to 4:00 PM.
23 *See* Docket No. 33. Apart from attendance of religious services, Mr. Trabulse has been unable to
24 leave his home on weekends.

25 On May 3, 2010, the Honorable William H. Alsup sentenced Mr. Trabulse to a term of
26 imprisonment of 97 months. *See* Docket No. 90. Mr. Trabulse was permitted to surrender

1 directly to the designated Bureau of Prisons institution within 90 days of the sentencing, or by
2 August 3, 2010, at 12:00 PM. *See id.* Mr. Trabulse has been informed by the U.S. Marshals
3 Service, through undersigned counsel, that he is to surrender directly to FCI Sheridan, a federal
4 prison in Oregon that is approximately 650 miles from Mr. Trabulse's home in Daly City,
5 California.

6 With his surrender only a matter of weeks away, Mr. Trabulse respectfully requests the
7 following modifications to his conditions of pretrial release to facilitate the moving and storing
8 of his personal effects and the lengthy trip to Sheridan, Oregon.

- 9 1. Mr. Trabulse requests that he be permitted to leave his home from 8:30 AM to
10 6:00 PM on Saturday, July 24, 2010, and from 8:30 AM to 6:00 PM on Saturday,
11 July 31, 2010. On those dates he will, with the help of family members, move his
12 personal effects from his rental home into storage at his daughter's home.
- 13 2. Mr. Trabulse requests that he be permitted to depart from Daly City on Sunday,
14 August 1, 2010, at 9:00 AM to drive to Sheridan, Oregon. He intends to complete
15 the 650-mile drive over the course of two days—August 1 and August 2—to
16 arrive in Sheridan on the evening of August 2 and be prepared to surrender on the
17 morning of August 3, as ordered.

18 Mr. Trabulse has been informed by his Pretrial Services Officer that he is to surrender the
19 electronic monitoring device before he departs for FCI Sheridan. Mr. Trabulse asks that he be
20 permitted to return the electronic monitoring device on his departure, as directed by Pretrial
21 Services.

22 Undersigned counsel for Mr. Trabulse has communicated with U.S. Pretrial Services
23 Officer Richard Sarlatte and confirmed that Mr. Sarlatte has no objection to the proposed course
24 of action. Officer Sarlatte or another Pretrial Services Officer will coordinate Mr. Trabulse's
25 departure for FCI Sheridan and the return of the electronic monitoring device.

1 IT IS SO STIPULATED.

2
3 DATED: July 22, 2010

_____/s/
Jonathan Schmidt
Assistant United States Attorney

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5 DATED: July 22, 2010

_____/s/
Loren D. Stewart
Assistant Federal Public Defender

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8
9 **[PROPOSED] ORDER**

10 For the foregoing reasons, the Court hereby ORDERS that the Defendant, Alexander
11 James Trabulse, shall be permitted to leave home for purposes of moving his personal effects on
12 July 24, 2010, from 8:30 AM to 6:00 PM, and again on July 31, 2010, from 8:30 AM to 6:00
13 PM. He shall also be permitted to depart for FCI Sheridan on August 1, 2010, at 9:00 AM, and
14 arrange for the return of the electronic monitoring device at that time. All other conditions of
15 pretrial release shall remain in full effect.

16
17 **IT IS SO ORDERED.**

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19 Dated: July 22, 2010

